

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Nicholas J. Cremona

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 10-04543

Plaintiff,

v.

DOUGLAS SHAPIRO,

Defendant.

**STIPULATION EXTENDING TIME TO SELECT A MEDIATOR**

This Stipulation Extending Time to Select a Mediator (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must select a mediator in the above-captioned case is extended up to and including November 16, 2015.

The purpose of this Stipulation is to provide time for the Parties to resolve this matter prior to engaging in and incurring the costs and expenses of mediation.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York  
November 6, 2015

Of Counsel:  
**Baker & Hostetler LLP**  
811 Main, Suite 1100  
Houston, Texas 77002  
Telephone: (713)751-1600  
Facsimile: (713)751-1717  
Dean D. Hunt  
Email: dhunt@bakerlaw.com  
Farrell A. Hochmuth  
Email: fhochmuth@bakerlaw.com

By: /s/ Nicholas J. Cremona  
**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
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the Estate of Bernard L. Madoff*

By: /s/ Martin B. Shulkin  
**Duane Morris, LLP**  
100 High Street, Suite 2400  
Boston, MA 02110-1724  
Telephone: (857) 448-4210  
Facsimile: (857) 401-3064  
Martin B. Shulkin  
mbshulkin@duanemorris.com

*Attorneys for Defendant Douglas Shapiro*